

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis Because this is a fully taxable transaction, a U.S. taxpayer that is a shareholder of Pretium that elected to receive Newcrest ordinary shares pursuant to the arrangement should take a tax basis in such ordinary shares equal to the fair market value of such shares on the closing date of the arrangement.

See Management Information Circular dated December 16, 2021 for additional information:
https://www.sedar.com/GetFile.do?lang=EN\&docClass=10\&issuerNo=00030613\&issuerType=03\&projectNo=03320006\&docld=5108029

Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates The closing price of Newcrest shares on the Australian Securities Exchange (Ticker symbol: NCM)
on March 9, 2022 was $\mathbf{A} \$ 28.20$ per share.

## Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based Section 1001, 1012
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18 Can any resulting loss be recognized? Yes
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19 Provide any other information necessary to implement the adjustment, such as the reportable tax year The closing date of the arrangement was March 9, 2022.
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[^0]:    Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

